

EXHIBIT 1

DECLARATION OF HILARET ZAROUKIAN

I, Hilaret Zaroukian, declare as follows:

1. I am the Plaintiff in the above-referenced case, including with respect to the First Cause of Action for Violation of the Consumer Legal Remedies Act. I am a competent adult, over eighteen years of age, and a resident of the State of California. I am making this declaration in support of my Class Action Complaint against Mercedes-Benz USA, LLC.

2. On or about May 26, 2018, I leased a new 2018 Mercedes, E300, Vehicle Identification Number WDDZF4JB2JA456029, from CalStar Motors Inc., an authorized dealership, in Glendale, California.

3. I understand Mercedes-Benz USA, LLC to be headquartered in Sandy Springs, GA. Accordingly, pursuant to California Civil Code section 1780(d), the United States District Court, Northern District of Georgia, is a proper venue for my claims for Violation of the California Consumer Legal Remedies Act.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 29th day of January 2021 in Glendale, California.

Hilaret Zaroukian

Hilaret Zaroukian (Jan 29, 2021 10:02 PST)

Hilaret Zaroukian